

To: Letzkus, Mary[Letzkus.Mary@epa.gov]
Cc: Choudhary, Shabir A WAD[Shabir.A.Choudhary@usace.army.mil]
From: Jacobus, Thomas P WAD
Sent: Mon 3/3/2014 11:51:55 AM
Subject: FW: DC0000019 Permit Renewal (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Mary,

Thank you for your consideration of Washington Aqueduct's request for a modification to its NPDES permit (DC 0000019) regarding outfall 006 (the Georgetown Conduit to the Potomac River).

We continue to believe that for routine operations, conducting an inspection of the conduit when empty on a three year cycle is appropriate. The conduit transporting raw water treated with aluminum sulfate has very little residual sediment on the bottom since the flow of the raw water during normal operations is at sufficient velocity to keep it in suspension. Once it gets to the Georgetown sedimentation basins the effect of the aluminum sulfate causes flocculation to occur and the sediment and coagulant are deposited in the Georgetown basins. The dredges then send those components back to the Residuals Processing Facility via one of the two pressure mains that were installed on the bottom of the conduit.

When outfall 006 is used what will come out is the raw water plus the aluminum sulfate in suspension that was added to induce coagulation at the Georgetown basins. The amount of aluminum that will be sent to the Potomac River will meet the concentrations specified in the permit, and compared to the residuals discharges from the Dalecarlia and Georgetown sedimentation basins, the total amount will be orders of magnitude less. We have taken a paragraph from the BE you attached and modified it to reflect this 2014 draft permit. Given that all of the toxicity testing conducted in the last two permit cycles showed no evidence of effects on the tested organisms and given that this single discharge once every three years will have no concentrated residuals, it seems very unlikely that this discharge would have an effect on living organisms beyond what has been previously permitted.

We have considered your suggestion for a provision to allow rain water that has collected in a clean empty sedimentation basin that is undergoing maintenance to be discharged via outfall 002, 003 or 004. It is relatively simple to pump that accumulated rainwater with a portable unit and put it in an adjoining sedimentation basin that is working or send it back to the Dalecarlia Reservoir via our filter backwash system. So, we have decided not to ask you to make that modification.

Shabir Choudhary can get you quantitative information on previous discharges comparing the total amount of aluminum to the amount in a discharge of the treated water from the Georgetown Conduit if you decide you need it.

Thank you for your assistance with this permit application.

Tom
202-764-0031

-----Original Message-----

From: Letzkus, Mary [mailto:Letzkus.Mary@epa.gov]
Sent: Monday, January 13, 2014 11:25 AM
To: Jacobus, Thomas P WAD
Cc: Yeany, Philip
Subject: [EXTERNAL] DC0000019 Permit Renewal

Hi Tom,

Just in case you thought I may have forgotten you.....I haven't. I am, however, working on the reissuance of the Aqueduct's NPDES permit. I have a couple of issues to relate. First, regarding the Aqueduct's request for a reduction of the aluminum permit limit for outfall 006. I've taken a long and hard look at this. I believe we can offer some relief, as you requested, e.g. increasing the average monthly limit from 4 mg/l to 6 mg/l provided that the discharge only occur one time in 3 years as the application suggests. If a second discharge were to occur the monthly average limit would revert to the 4 mg/l level. This would be based on the fact that significant improvements were made to the facility and that this is a discontinuous discharge.

Secondly, I've been talking to Christine Vaccarro, who has taken Julie Crocker's position at NMFS. She thinks, and I agree, that we will need a new Biological Evaluation to accompany the draft permit. To help move this along, would you please assign this to a member of your staff? I have attached a copy of the 2008 BE to this email. What I need is some information and data to describe the effect (change) of the discharges (or lack thereof) on living resources now as compared to back in 2008 when the permit was last reissued. I don't necessarily need someone to write the BE (although if you want to take a stab at it that's ok with me), but I do need some information which hopefully you have.

Also, it has been my understanding that the Aqueduct may (rarely) need to discharge from outfalls 002,003 or 004 in the rare event that the basins are drained and cleaned. By this I obviously don't mean a large discharge which no longer happens, just some O&M to clean residuals from the basins. Please advise if I am mistaken and this won't be necessary. If you need this coverage, please point me to where in the application that is covered, if it is not, please add that information as a cover letter or email to me so I can address it in the permit/fact sheet.

If there is anything else, I'll be in touch.

Hope you are well.

Best wishes.

Mary

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